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5 *Attorneys for Aniceto T. Ogumoro*

6 **IN THE UNITED STATES DISTRICT COURT**  
 7 **FOR THE**  
**NORTHERN MARIANA ISLANDS**

8 ANICETO T. OGUMORO,

9 Plaintiff

10 v.

11 JUAN I.WABOL, EDWARD MANALILI,  
 JAMES GUERRERO, CHRISTOPHER LEON)  
 12 GUERRERO, JESSE SEMAN, and Does 1-20,)

13 Defendants.

**CIVIL ACTION NO. 08-0010**

**STIPULATION TO TAKE OFF  
 CALENDAR OR IN THE ALTERNATIVE,  
 TO ENLARGE TIME**

15 **NOW COMES** Plaintiff, Aniceto T. Ogumoro (hereinafter "Mr. Ogumoro") and Defendants Juan  
 16 I. Wabol (hereinafter "Defendant Wabol"), Edward Manalili (hereinafter "Defendant Manalili"), James  
 17 Guerrero (hereinafter "Defendant "Guerrero"), Christopher Leon Guerrero (hereinafter "Defendant Leon  
 18 Guerrero"), and Jesse Seman (hereinafter "Defendant Seman")(collectively referred to as "Defendants")  
 19 to respectfully request this honorable court to take this matter off calendar or in the alternative, to enlarge  
 20 time.

- 21 1. On or about June 6, 2008, Mr. Ogumoro filed his First Amended Complaint;
- 22 2. On or about June 18, 2008, counsel for the parties engaged in discussions on the parties'- 23 respective interest in settling the matter;
- 24 3. On or about June 19, 2008, the parties stipulated and the court granted to enlarge time for

1 Defendants to submit a response;

2 4. Mr. Ogumoro expressed an interest to Defendants in settlement that takes into account, among  
3 other things, attorney's fees and costs with the above entitled matter;

4 5. On or about June 27, 2008, Defendants filed a Motion to Dismiss the First Amended Complaint;

5 6. Since the filing of the pleading in ¶5 above, the parties have engaged in various discussions  
6 including settlement and Defendant counsel's need to go off island until no earlier than September  
7 15, 2008 for personal reasons;

8 7. Defendants' counsel has informed Mr. Ogumoro that his client is currently off island and has been  
9 unable to communicate with him regarding settlement;

10 8. On or about July 31, 2008, information concerning a shift in management at DPS surfaced which  
11 has a potential for impacting the parties' settlement discussions;

12 In order to allow the parties to discuss settlement, defray further attorney's fees and costs to Mr.  
13 Ogumoro associated with bringing forth the above entitled matter and to accommodate Defendant's  
14 counsel's need to be off island, the parties hereby respectfully request this court to enlarge the time for  
15 filing of any other pleadings in this matter until such time as the parties are unable to come to a non-trial  
16 disposition, but no later than September 30, 2008.

17 Respectfully submitted this 4<sup>th</sup> day of August, 2008.

18  
19 /s/  
20 Braddock Huesman  
Attorney for Defendants

/s/  
Viola Alepuyo  
Attorney for Plaintiffs